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*Attorneys for Defendant Solana Labs, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MARK YOUNG, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

SOLANA LABS, INC., THE SOLANA  
FOUNDATION, ANATOLY  
YAKOVENKO, MULTICOIN CAPITAL  
MANAGEMENT LLC, KYLE SAMANI, and  
FALCONX LLC,  
Defendants.

Case No.: 3:22-cv-03912-RFL

**DECLARATION OF MORGAN E.  
WHITWORTH IN SUPPORT OF  
STIPULATION CONTINUING  
DEFENDANTS' TIME TO RESPOND TO  
CONSOLIDATED AMENDED CLASS  
ACTION COMPLAINT**

(Civil L.R. 6-1, 6-2, 7-12)

Hon: Rita F. Lin

1 I, Morgan E. Whitworth, hereby declare as follows:

2 1. I am an attorney admitted to practice law in the state of California and before this  
3 Court and a partner of Latham & Watkins LLP, counsel of record for defendant Solana Labs,  
4 Inc. ("Solana") in the above-captioned action. I submit this declaration in support of the Parties'  
5 Stipulation Continuing Defendants' Time to Respond to the Consolidated Amended Class Action  
6 Complaint. I make this declaration based on my personal knowledge.

7 2. On January 12, 2024, Plaintiff filed his Consolidated Amended Class Action  
8 Complaint ("Amended Complaint") (Dkt. 68).

9 3. Pursuant to the Court's December 21, 2023 Order, the last day for Defendants to  
10 respond to the Amended Complaint is March 12, 2024 (Dkt. 67).

11 4. Other than the stipulation setting the current briefing schedule, which provides the  
12 only deadlines that have been set in this Action thus far, no extensions have been requested or  
13 granted, and the Court has not stated that further extensions will not be granted.

14 5. Since the filing of the Amended Complaint, the Parties have engaged in a  
15 productive meet and confer process in an attempt to narrow the issues in dispute and minimize  
16 any overlap in the Defendants' respective responses to the Amended Complaint.

17 6. The Parties anticipate that through this process, the number of issues to be  
18 addressed in Defendants' anticipated Motions to Dismiss could be narrowed and any overlap  
19 between the Defendants' respective motions minimized.

20 7. The Parties have conferred and, in the interests of efficiency and allowing  
21 additional time for the parties to continue meeting and conferring in an attempt to narrow the  
22 issues in dispute, respectfully request that the Court extend the deadline for Defendants to submit  
23 their respective responses to the Amended Complaint by thirty days, Plaintiff's response(s) in  
24 opposition to the anticipated Motions to Dismiss by a corresponding thirty days, and Defendants'  
25 respective replies by a corresponding 30 days.

26 8. Counsel for Plaintiff and Defendants in the above-captioned action respectfully  
27 submit that good cause exists for the requested extension.

28

Executed this 13th Day of February 2024, in Menlo Park, California.

/s/ Morgan E. Whitworth  
Morgan E. Whitworth